

McCormick, Barstow, Sheppard,
Wayte & Carruth LLP
Jonathan W. Carlson
Nevada Bar No. 10536
jonathan.carlson@mccormickbarstow.com
Cheryl A. Grames
Nevada Bar No. 12752
cheryl.grames@mccormickbarstow.com
7160 Rafael Rivera Way, Suite 320
Las Vegas, Nevada 89113
Telephone: (702) 949-1100
Facsimile: (702) 949-1101

Attorneys for GEICO CASUALTY COMPANY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NICOLLE JONES PARKER, an individual,

Plaintiff,

v.

GEICO CASUALTY COMPANY, an entity
licensed to do business in Nevada; DOES I-X,
and ROES XI-XX,

Defendants.

Case No. 2:24-cv-02396-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
RESPONSE TO FIRST AMENDED
COMPLAINT**

Second Request

Plaintiff NICOLLE JONES PARKER (“Plaintiff”), by and through her attorneys of record, and Defendant GEICO CASUALTY COMPANY (“GEICO”), by and through its attorneys of record, hereby file this Stipulation and Order to extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint (ECF No. 27, filed on Aug. 27, 2025). The current deadline for filing the responsive pleading is October 10, 2025. The parties seek a ninety-day (90) extension of that deadline to January 8, 2026.

The parties have good cause to seek an extension of the current deadline for responding to the First Amended Complaint. Specifically, as indicated by the March 21, 2025 Notice of Bankruptcy (ECF No. 20), Plaintiff initiated a bankruptcy action. In the course of the bankruptcy proceedings, the U.S. Bankruptcy Trustee authorized resolution of Plaintiff’s suit against GEICO.

1 Following the previous request for an extension, the U.S. Bankruptcy Trustee awaits the outcome
2 of subrogation with Plaintiff's health insurer. Personnel at the Veterans Administration handling the
3 subrogation process are furloughed currently due to the federal government shutdown. As the parties
4 do not know exactly how long it will take for Veterans Administration's subrogation to conclude,
5 the parties now seek a longer extension of the instant deadline to avoid unnecessary litigation costs
6 being incurred that would affect the debtor's (now the U.S. Trustee's) estate. (ECF Nos. 25 and 26).
7 As such, the parties and their counsel submit that good cause exists for this extension of the
8 responsive pleading deadline.

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED between the parties to
2 extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint from
3 October 10, 2025 to January 8, 2026, thereby allowing for sufficient time for the U.S. Bankruptcy
4 Judge to consider and to approve the settlement.

5 DATED October 10, 2025.

6 McCORMICK, BARSTOW, SHEPPARD,
7 WAYTE & CARRUTH LLP

8 By /s/ Cheryl A. Grames

9 Jonathan W. Carlson
10 Nevada Bar No. 10536
11 Cheryl A. Grames
12 Nevada Bar No. 12752
13 7160 Rafael Rivera Way, Suite 320
14 Las Vegas, Nevada 89113
15 Tel. (702) 949-1100
16 *Attorneys for GEICO Casualty Company*

17 DATED October 10, 2025.

18 LBC LAW GROUP

19 By: /s/John C. Courtney

20 John C. Courtney
21 Nevada Bar No. 11092
22 Andrew P. Dunning
23 Nevada Bar No. 13864
24 723 South 7th Street
25 Las Vegas, Nevada 89101
26 *Attorneys for Plaintiff*

27 **ORDER**

28 **IT IS SO ORDERED.**

032193-000463 12108017.1


Hon. Maximiliano D. Couvillier, III
UNITED STATES MAGISTRATE JUDGE

Dated: October 14, 2025